

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

JOAQUIN SERRANO, on behalf of himself and
all others similarly situated,

Plaintiff,

v.

APPLE INC.,

Defendant.

Case No.: 2:23-cv-00070-HB

JOINT MOTION FOR AN EXTENSION OF TIME

The Parties, through their respective undersigned counsel, hereby jointly move for an extension of time for Defendant to respond to Plaintiff's Complaint (Docket #1). In support, the Parties state as follows:

1. Plaintiff filed a Complaint on January 6, 2023 (Docket #1).
2. Plaintiff served Defendant with the summons and Complaint on January 9, 2023 (Docket #6).
3. Defendant's response to the Complaint is currently due on January 30, 2023.
4. Counsel have met and conferred in good faith regarding extending the deadline for Defendant to respond to the Complaint. Counsel believe that good cause exists for a 45-day extension, including Defendant's engagement of local counsel, Defendant's need to investigate the allegations in the Complaint, and counsel's scheduling obligations in other matters.
5. Counsel further agree that a 45-day extension to Defendant's deadline to respond to the Complaint would permit them to meet their obligations to the court and their clients in this matter without prejudicing the rights of either party.
6. Neither party has previously requested an extension of time in this matter.

7. For the foregoing reasons, the parties respectfully request that the Court enter an order extending Defendant's deadline to respond to the Complaint to March 16, 2023.

WHEREFORE, for good cause shown, the Parties respectfully request that the Court extend Defendant's deadline to respond to the Complaint as set forth herein and in the attached proposed Order.

Respectfully submitted,

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putative class*

Dated: January 25, 2023

CERTIFICATE OF SERVICE

I hereby certify on this 25th day of January 2023, a copy of the foregoing was served on the following counsel for Plaintiff via the Court's CM/ECF system:

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